

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Toni Murphy and Arthur Murphy
Debtors,

Lakeview Loan Servicing, LLC,
Movant,

v.

Toni Murphy and Arthur Murphy,
Respondent/Debtors,
and
Kenneth E. West, Office of the Chapter 13
Standing Trustee, Trustee,
Additional Respondent.

CHAPTER 13

BANKRUPTCY CASE NUMBER
23-12591-pmm

**OBJECTION OF LAKEVIEW LOAN SERVICING, LLC TO CONFIRMATION OF
DEBTOR'S CHAPTER 13 PLAN OF REORGANIZATION**

Lakeview Loan Servicing, LLC, by and through its counsel, LOGS Legal Group LLP, hereby objects to the confirmation of Debtor's Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about August 30, 2023, Debtors filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. Movant holds an allowed claim, secured only by Debtor's principal residence located at 6636 N 17th St, Philadelphia, PA 19126.
3. On or about October 25, 2023, Movant filed a Proof of Claim citing arrears in the amount of \$69,686.04, and a total claim in the amount of \$210,237.17.
4. Debtor's proposed plan calls for the payment to Movant of arrearages in the amount of \$67,907.90 to be paid to the Trustee through the Plan.
5. The Plan fails to comply with 11 U.S.C. § 1322.
6. The Plan fails to comply with 11 U.S.C. § 1325.
7. The Court must deny confirmation of Debtor's Chapter 13 Plan.

WHEREFORE, Lakeview Loan Servicing, LLC respectfully requests that confirmation of the Debtor's Plan be denied, that Debtor's bankruptcy petition be dismissed with prejudice; and for such other relief as this Court deems appropriate.

Respectfully submitted,

Dated: February 2, 2024

LLG File #:23-069831

BY: /s/ Christopher A. DeNardo
Christopher A. DeNardo, Esquire
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CERTIFICATE OF SERVICE

I, Christopher A. DeNardo, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of Lakeview Loan Servicing, LLC's Objection to the Confirmation of Debtor's Chapter 13 Plan by First Class Mail, postage prepaid or by electronic notification, at the respective last known address or email address of each person set forth below on February 2, 2024:

Michael A. Cibik, Esquire
Cibik Law, P.C.
1500 Walnut Street
Suite 900
Philadelphia, PA 19102
Sent via electronic notification mail@cibiklaw.com

Kenneth E. West, Office of the Chapter 13 Standing Trustee, Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107
Sent via electronic notification ecfemails@ph13trustee.com

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE
AND CORRECT.

/s/ Christopher A. DeNardo

Christopher A. DeNardo 78447
LOGS Legal Group LLP
985 Old Eagle School Road, Suite 514
Wayne, PA 19087
(610) 278-6800

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